

STATE OF INDIANA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
PUBLIC NOTICE NO. 20210616 IN0002259 – D
DATE OF NOTICE: JUNE 16, 2021
DATE RESPONSE DUE: JULY 16, 2021

The Office of Water Quality proposes the following NPDES DRAFT PERMIT:

MAJOR – MODIFICATION

SIGECO F.B. CULLEY GENERATING STATION, Permit No. IN0002259, WARRICK COUNTY, 3700 Darlington Road, Newburgh, IN. This modification is because the permittee has decided to re-route non-CCR waste from 201 to 101. Permit Manager: Jennifer Elliot, 317/232-8702, jelliot@idem.in.gov. Posted online at <https://www.in.gov/idem/6408.htm>.

PROCEDURES TO FILE A RESPONSE

Draft can be viewed or copied (10¢ per page) at IDEM/OWQ NPDES PS, 100 North Senate Avenue, (Rm 1203) Indianapolis, IN, 46204 (east end elevators) from 9 – 4, Mon - Fri, (except state holidays). A copy of the Draft Permit is on file at the local County Health Department. Please tell others you think would be interested in this matter. For your rights & responsibilities see: Public Participation Guide: <http://www.in.gov/idem/5474.htm> or Citizens' Guide to IDEM: <https://www.in.gov/idem/6900.htm>.

Response Comments: The proposed decision to issue a permit is tentative. Interested persons are invited to submit written comments on the Draft permit. All comments must be postmarked no later than the Response Date noted to be considered in the decision to issue a Final permit. Deliver or mail all requests or comments to the attention of the Permit Writer at the above address, (mail code 65-42 PS).

To Request a Public Hearing:

Any person may request a Public Hearing. A written request must be submitted to the above address on or before the Response Date noted. The written request shall include: the name and address of the person making the request, the interest of the person making the request, persons represented by the person making the request, the reason for the request and the issues proposed for consideration at the Hearing. IDEM will determine whether to hold a Public Hearing based on the comments and the rationale for the request. Public Notice of such a Hearing will be published in at least one newspaper in the geographical area of the discharge and sent to anyone submitting written comments and/or making such request and whose name is on the mailing list at least 30 days prior to the Hearing.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

June 16, 2021

VIA ELECTRONIC MAIL

Angela Casbon-Scheller, Environmental Operations Manager
SIGECO F.B. Culley Generating Station
d/b/a CenterPoint Energy Indiana South
P.O. Box 209
Evansville, IN 47702

Dear Angela Casbon-Scheller:

Re: NPDES Permit No. IN0002259
Draft Permit Modification
SIGECO F.B. Culley Generating Station
d/b/a CenterPoint Energy Indiana South
Newburgh, Indiana – Warrick County

Your request for a permit modification has been reviewed and processed in accordance with rules adopted under 327 IAC 5. Enclosed is a copy of the draft permit modification. Pursuant to IC 13-15-5-1, IDEM will publish the draft permit document online at <https://www.in.gov/idem/5474.htm>. Additional information on public participation can be found in the "Citizens' Guide to IDEM", available at <https://www.in.gov/idem/6900.htm>. A 30-day comment period is available to solicit input from interested parties, including the public.

Please review this draft permit modification and associated documents carefully to become familiar with the proposed terms and conditions. Comments concerning the draft permit modification should be submitted in accordance with the procedure outlined in the enclosed public notice form. We suggest that you meet with us to discuss major concerns or objections you may have with the draft permit modification. Questions concerning this draft permit modification may be addressed to Jennifer Elliot of my staff, at 317/232-8702 or Jelliot@idem.in.gov.

Sincerely,

Nikki Gardner

Nikki Gardner, Chief
Industrial NPDES Permits Section
Office of Water Quality

Enclosures

cc: Warrick County Health Department
Chuck Strunk, IDEM Inspector
IDEM SWRO
Chief, Permits Section, U.S. EPA, Region 5
Stacey Cochran, ORSANCO

STATE OF INDIANA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AMENDED AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et seq., the "Clean Water Act" or "CWA"), and IDEM's permitting authority under IC 13-15,

SIGECO F.B. CULLEY GENERATING STATION
D/B/A CENTERPOINT ENERGY INDIANA SOUTH

is authorized to discharge from a steam electric generating plant located at 3700 Darlington Road in Newburg, Indiana, to receiving waters named the Ohio River in accordance with effluent limitations, monitoring requirements, and other conditions set forth in Parts I, II, III and IV hereof.

The permit, as issued on May 1, 2017, and subsequently modified on February 7, 2018, January 6, 2020, and December 30, 2020, is hereby amended, as contained herein. The amended provisions shall become effective _____. All terms and conditions of the permit not modified at this time remain in effect. Further, any existing condition or term affected by the amendments will remain in effect until the amended provisions become effective. This permit may be revoked for the nonpayment of applicable fees in accordance with IC 13-18-20.

This permit and the authorization to discharge, as amended, shall expire at midnight April 30, 2022. In order to receive authorization to discharge beyond the date of expiration, the permittee shall submit such information and forms as are required by the Indiana Department of Environmental Management no later than 180 days prior to the date of expiration.

Issued on _____ for the Indiana
Department of Environmental Management.

Jerry Dittmer, Chief
Permits Branch
Office of Water Quality

2. The permittee is authorized to discharge in accordance with the terms and conditions of this permit from Outfalls 101. The discharge is limited to discharge from the Contact Stormwater Pond. Samples taken in compliance with the monitoring requirements below shall be taken at a point representative of the discharge but prior to mixing with any other wastestreams. Such discharge shall be limited and monitored by the permittee as specified below:

DISCHARGE LIMITATIONS [1, 3, 4]
Internal Outfalls 101

Table 1

<u>Parameter</u>	Quantity or Loading			Quality or Concentration			Monitoring Measurement <u>Frequency</u>	Requirements Sample <u>Type</u>
	<u>Monthly Average Report</u>	<u>Daily Maximum Report</u>	<u>Units</u>	<u>Monthly Average</u>	<u>Daily Maximum</u>	<u>Units</u>		
Flow	Report	Report	MGD	-	-	-	1 X Day	24 Hr. Total
Oil & Grease[2] -	-	-	-	15	20	mg/l	1 X Week	Grab
TSS[2] -	-	-	-	30	70	mg/l	1 X Week	Grab
COD -	-	-	-	-	Report	mg/l	Semi-Annual	Grab
CBOD5 -	-	-	-	-	Report	mg/l	Semi-Annual	Grab
Total Kjeldahl Nitrogen	-	-	-	-	Report	mg/l	Semi-Annual	Grab
Nitrate + Nitrite Nitrogen	-	-	-	-	Report	mg/l	Semi-Annual	Grab
Total Phosphorus	-	-	-	-	Report	mg/l	Semi-Annual	Grab
Copper [2,5,7] -	-	-	-	-	0.2	mg/l	1 X Day	24 Hr. Comp.
Iron [2,5,6,7] -	-	-	-	1.0	1.0	mg/l	1 X Day	24 Hr. Comp.

Table 2

<u>Parameter</u>	Quality or Concentration			Monitoring Measurement <u>Frequency</u>	Requirements Sample <u>Type</u>
	<u>Daily Minimum</u>	<u>Daily Maximum</u>	<u>Units</u>		
pH	6.0	9.0	s.u.	1 X Day	Grab

- [1] See Part III of the permit for additional requirements.
- [2] With the next permit renewal application, the permittee is required to submit flow data for all regulated, non-regulated, and dilution wastestreams and the concentration of the selected parameters contributed by each of these wastestreams for use in developing alternate limitations using the combined wastestream formula (CWF). At the next permit renewal limits will be developed using either the combined wastestream formula or by establishing internal outfalls for determining compliance with 40 CFR 423.
- [3] Monitoring at Internal Outfall 101 is only required when the outfall is discharging to the discharge tunnel which leads to Outfall 001.

- [4] The West Ash Pond ceased receiving bottom ash, fly ash and FGD wastewater in October 2015.
- [5] These limitations and monitoring requirements apply only during discharge of metal cleaning wastes.
- [6] Net limits may apply. Net limitations are to be calculated by subtracting the measured background levels of these parameters in the ash pond from the actual measured concentrations of these parameters when limitations apply. These background levels are to be calculated by monitoring the ash pond effluent concentrations of Iron and Copper over a period of time, to consist of a minimum of ten samples taken over a minimum of thirty (30) days when there is no discharge of metal cleaning wastes during a period that is at least 30 days but not to exceed 90 days preceding each discharge of metal cleaning wastes. The background levels demonstrated by this monitoring, along with supporting data are to be submitted with monthly Discharge Monitoring Reports (DMR) when reporting discharge of metal cleaning wastes. A new database shall be established in the quarter preceding each subsequent discharge of metal cleaning wastes.
- [7] The permittee shall measure and report the identified metal in total recoverable form.

3. The permittee is authorized to discharge in accordance with the terms and conditions of this permit from Outfall 201. The discharge is limited to discharge from the East Ash Pond. Samples taken in compliance with the monitoring requirements below shall be taken at a point representative of the discharge but prior to mixing with any other wastestreams. Such discharge shall be limited and monitored by the permittee as specified below:

DISCHARGE LIMITATIONS [1, 2, 4, 5]

Internal Outfalls 201

Table 1

<u>Parameter</u>	<u>Quantity or Loading</u>		<u>Units</u>	<u>Quality or Concentration</u>		<u>Units</u>	<u>Monitoring Requirements</u>	
	<u>Monthly Average Report</u>	<u>Daily Maximum Report</u>		<u>Monthly Average</u>	<u>Daily Maximum</u>		<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow			MGD	-	-	-	1 X Day	24 Hr.
Total								
Oil & Grease[3]	-	-	-	15	20	mg/l	1 X Week	Grab
TSS[3]	-	-	-	30	70	mg/l	1 X Week	Grab

Table 2

<u>Parameter</u>	<u>Quality or Concentration</u>		<u>Units</u>	<u>Monitoring Requirements</u>	
	<u>Daily Minimum</u>	<u>Daily Maximum</u>		<u>Measurement Frequency</u>	<u>Sample Type</u>
pH	6.0	9.0	s.u.	1 X Day	Grab

- [1] See Part III of the permit for additional requirements.
- [2] Monitoring at Internal Outfall 201 is only required when the outfall is discharging to the discharge tunnel which leads to Outfall 001.
- [3] With the next permit renewal application, the permittee is required to submit flow data for all regulated, non-regulated, and dilution wastestreams and the concentration of the selected parameters contributed by each of these wastestreams for use in developing alternate limitations using the combined wastestream formula (CWF). At the next permit renewal limits will be developed using either the combined wastestream formula or by establishing internal outfalls for determining compliance with 40 CFR 423.
- [4] Beginning December 31, 2020, there shall be no discharge of pollutants in bottom ash transport water from Unit 3. Beginning December 31, 2023, there shall be no discharge of pollutants in bottom ash transport water from Unit 2.
- [5] Beginning November 1, 2018, there shall be no discharge of fly ash transport water.



**National Pollutant Discharge Elimination System
Briefing Memo for
SIGECO F.B. Culley Generating Station
d/b/a CenterPoint Energy Indiana South
Draft modification: June 2021**

Indiana Department of Environmental Management

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

Permittee:	SIGECO F.B. Culley Generating Station d/b/a CenterPoint Energy Indiana South P.O. Box 209 Evansville, IN 47702
Existing Permit Information:	Permit Number: IN0002259 Expiration Date: April 30, 2022
Facility Contact:	Angela Casbon-Scheller (812) 491-4787 Angela.Casbon-Scheller@centerpointenergy.com
Facility Location:	3711 Darlington Road Newburgh, Indiana 47630 Warrick County
Receiving Stream:	Ohio River
GLI/Non-GLI:	Non-GLI
Proposed Permit Action:	Modify
Date Application Received:	May 13, 2021
Source Category	NPDES Major – Industrial
Permit Writer:	Jennifer Elliot (317) 232-8702 JElliot@idem.in.gov

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1.0 INTRODUCTION

The Indiana Department of Environmental Management (IDEM) received a request from SIGECO F.B. Culley Generating Station d/b/a CenterPoint Energy Indiana South on May 13, 2021 to modify National Pollutant Discharge Elimination System (NPDES) Permit IN0002259. The current five year permit was issued with an effective date of May 1, 2017 in accordance with 327 IAC 5-2-6(a). The permit was subsequently corrected on April 25, 2017 and modified on February 7, 2018, January 6, 2020, and December 30, 2020.

The Federal Water Pollution Control Act (more commonly known as the Clean Water Act), as amended, (Title 33 of the United States Code (U.S.C.) Section 1251 et seq.), requires an NPDES permit for the discharge of pollutants into surface waters. Furthermore, Indiana law requires a permit to control or limit the discharge of any contaminants into state waters or into a publicly owned treatment works. This proposed permit action by IDEM complies with and implements these federal and state requirements.

In accordance with Title 40 of the Code of Federal Regulations (CFR) Sections 124.8 and 124.56, as well as Title 327 of the Indiana Administrative Code (IAC) Article 5-3-8, a Fact Sheet is required for certain NPDES permits. This document fulfills the requirements established in these regulations. This Fact Sheet was prepared in order to document the factors considered in the development of NPDES Permit effluent limitations. The technical basis for the Fact Sheet may consist of evaluations of promulgated effluent guidelines, existing effluent quality, receiving water conditions, Indiana water quality standards-based wasteload allocations, and other information available to IDEM. Decisions to award variances to Water Quality Standards or promulgated effluent guidelines are justified in the Fact Sheet where necessary. This Fact Sheet also identifies the modified pages of the permit as issued on March 28, 2017.

2.0 FACILITY DESCRIPTION

2.1 General

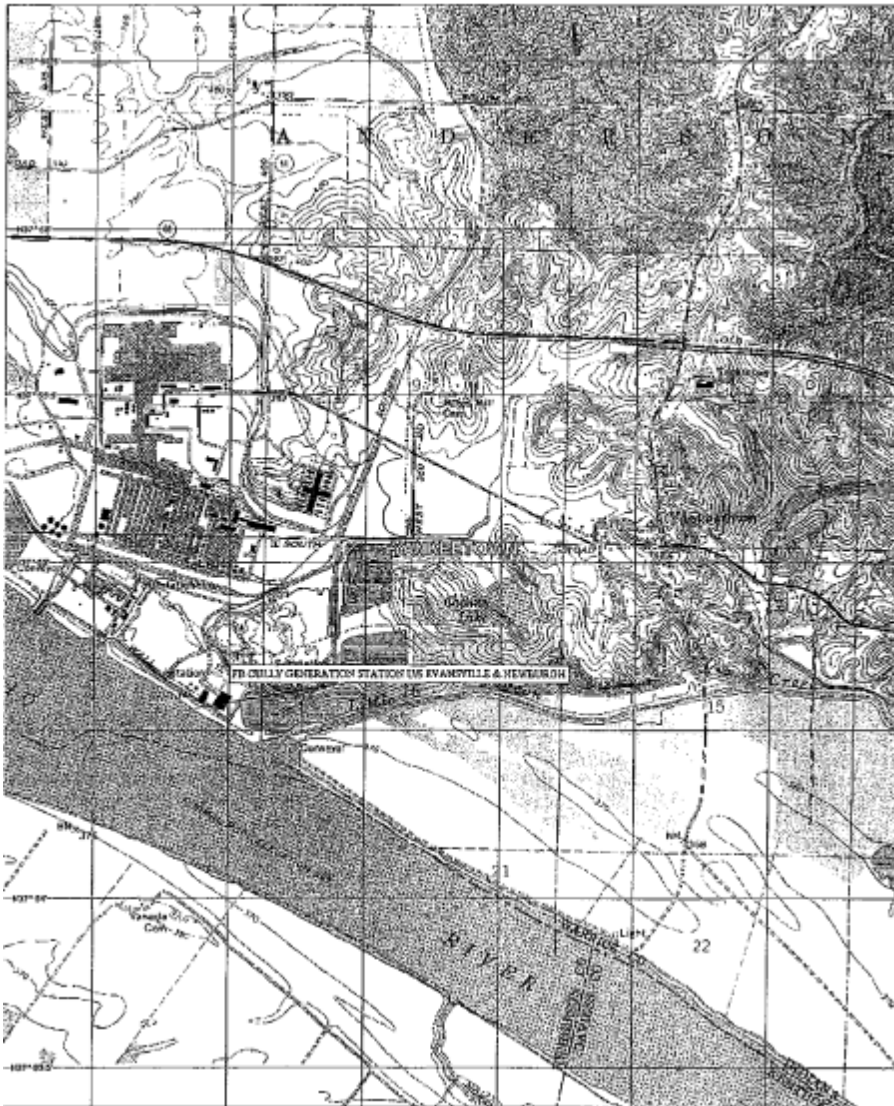
SIGECO F.B. Culley Generating Station d/b/a CenterPoint Energy Indiana South is classified under Standard Industrial Classification (SIC) Code 4911 – Electric Power Services.

The facility is a coal fired steam electric generating plant with two (2) generating units which are 100 MW (Unit 2) and 270 MW (Unit 3). The Ohio River accounts for approximately 99% of the facility's intake water with well water accounting for the remainder. Discharges from this facility are to the Ohio River. Outfall 001 discharges water from the Contact Stormwater Pond (internal Outfall 101) and East Ash Pond (internal Outfall 201) as well as once through non-contact cooling water. Internal Outfall 301 consists of FGD wastewater treatment plant discharge, which discharges to the East Ash Pond. Outfall 004 discharges treated sanitary wastewater.

Effective October 1, 2015, the Unit 2 bottom ash lines and other waters associated with the Unit 2 boiler were re-routed to the East Ash Pond, which discharges through Outfall 201. Beginning July 1, 2021, non-CCR waters will be re-routed to the Contact Stormwater Pond, which discharges through Internal Outfall 101.

A map showing the location of the facility has been included as Figure 1.

Figure 1: Facility Location/Site Map



SIGECO F.B. Culley Generating Station
3700 Darlington Road
Newburgh, IN 47630
Warrick County

2.2 Outfall Locations

Outfall 001	Latitude: 37° 54' 35.29" Longitude: -87° 19' 37.99"
Outfall 101	Latitude: 37° 54' 44.36" Longitude: -87° 19' 50.81"
Outfall 201	Latitude: 37° 54' 34.49" Longitude: -87° 19' 27.59"
Outfall 301	Latitude: 37° 54' 31.32" Longitude: -87° 19' 17.10"
Outfall 004	Latitude: 37° 54' 38.36" Longitude: -87° 19' 35.09"
Outfall 005	Latitude: 37° 54' 42.40" Longitude: -87° 19' 51.49"

3.0 PERMIT MODIFICATION

3.1 Modification Request

Southern Indiana Gas and Electric Company (SIGECO) is requesting permit language modifications for activities and changes related to the re-routing of non-CCR waters from the east ash pond to the Contact Stormwater Pond. These permit language modifications affect the description for internal outfalls 101 and 201. The re-routing of the non-CCR water is occurring in accordance with the requirement found in 40 CFR, Subpart D of the EPA's Coal Combustion Residuals Final Rule (CCR) and applicable IDEM requirements.

Internal outfall 101 consists of discharge from the new Contact Stormwater Pond that became operational in December 2020 with discharge beginning in January 2021. The contact stormwater pond, which is approximately 3 acres in size and located in the southeastern corner of the former West Ash Pond, is designed to manage flows upwards of 30 cfs, which is the 100-year, 6-hour runoff from existing contact storm water sources. The contact stormwater pond is sized to allow for settlement of solids to take place in order to satisfy the existing West Ash Pond NPDES discharge limitations. The Contact Stormwater Pond conveys treated water via a controlled discharge outlet structure and gravity pipeline connected to the Culley Station Unit 2 basement piping, which conveys these flows to existing NPDES Outfall 001.

Internal Outfall 201 will continue to consist of discharge from the East Ash Pond. The flow to the East Ash Pond will be reduced to only Unit 2 bottom ash transport water and FGD wastewater that has been routed through the chemical-precipitation system mix tanks and to the East Ash Pond for the sedimentation step of the treatment process.

3.2 IDEM's Proposed Modification

- Limitations and monitoring requirements for Copper and Iron will be moved from Outfall 201, to Outfall 101 in the permit.
- Footnote [4] under Outfall 101 in the permit, will reflect the closure of the West Ash Pond.
- Footnote [3] under Outfall 201 in the permit, will be moved to footnote [5] under Outfall 101.
- Footnotes under Outfall 201 will be renumbered as appropriate.

3.3 Antibacksliding

Pursuant to 327 IAC 5-2-10(a)(11), unless an exception applies, a permit may not be renewed, reissued or modified to contain effluent limitations that are less stringent than the comparable effluent limitations in the previous permit. None of the limits included in this permit are less stringent than the comparable effluent limitations in the previous permit, therefore, backsliding is not an issue in accordance with 327 IAC 5-2-10(a)(11).

3.4 Antidegradation

Indiana's Antidegradation Standards and Implementation procedures are outlined in 327 IAC 2-1.3. The antidegradation standards established by 327 IAC 2-1.3-3 apply to all surface waters of the state. The permittee is prohibited from undertaking any deliberate action that would result in a new or increased discharge of a bioaccumulative chemical of concern (BCC) or a new or increased permit limit for a regulated pollutant that is not a BCC unless information is submitted to the commissioner demonstrating that the proposed new or increased discharge will not cause a significant lowering of water quality, or an antidegradation demonstration submitted and approved in accordance 327 IAC 2-1.3-5 and 2-1.3-6. The NPDES permit does not propose to establish a new or increased loading of a regulated pollutant; therefore, the Antidegradation Implementation Procedures in 327 IAC 2-1.3-5 and 2-1.3-6 do not apply to the permitted discharge.

3.5 Spill Response and Reporting Requirement

Reporting requirements associated with the Spill Reporting, Containment, and Response requirements of 327 IAC 2-6.1 are included in Part II.B.2.(d), Part II.B.3.(c), and Part II.C.3. of the NPDES permit. Spills from the permitted facility meeting the definition of a spill under 327 IAC 2-6.1-4(15), the applicability requirements of 327 IAC 2-6.1-1, and the Reportable Spills requirements of 327 IAC 2-6.1-5 (other than those meeting an exclusion under 327 IAC 2-6.1-3 or the criteria outlined below) are subject to the Reporting Responsibilities of 327 IAC 2-6.1-7.

It should be noted that the reporting requirements of 327 IAC 2-6.1 do not apply to those discharges or exceedances that are under the jurisdiction of an applicable permit when the substance in question is covered by the permit and death or acute injury or illness to animals or humans does not occur. In order for a discharge or exceedance to be under the jurisdiction of this NPDES permit, the substance in question (a) must have been discharged in the normal course of operation from an outfall listed in this permit, and (b) must have been discharged from an outfall for which the permittee has authorization to discharge that substance.

3.6 Permit Processing/Public Comment

Pursuant to IC 13-15-5-1, IDEM will publish the draft permit document online at <https://www.in.gov/idem/5474.htm>. Additional information on public participation can be found in the "Citizens' Guide to IDEM", available at <https://www.in.gov/idem/6900.htm>. A 30-day comment period is available to solicit input from interested parties, including the public.